

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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In the Matter of the Application of Pacific Gas
and Electric Company for Approval of its
Electric Vehicle Infrastructure and Education
Program (U39E).

Application 15-02-009
(Filed February 9, 2015)

**CHARGEPOINT, INC. AND ELECTRIC VEHICLE CHARGING ASSOCIATION
NOTICE OF EX PARTE COMMUNICATION**

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Dated: June 21, 2016

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NOTICE OF EX PARTE COMMUNICATION**

In accordance with Rule 8.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, ChargePoint, Inc. and the Electric Vehicle Charging Association (“EVCA”) provide notice of the following ex parte communication with Jennifer Kalafut, advisor to Commissioner Peterman. The communication took place in person at the Commission offices in San Francisco from 2:30-3:00 p.m. on Thursday, June 16, 2016.

The ex parte communication was initiated by request of Anne Smart, Director, Government Relations and Regulatory Affairs for ChargePoint, Inc. Also present were Colleen Quinn, ChargePoint Vice President, Government Relations and Public Policy, Jim Hawley, representing EVCA, and Abdellah Cherkaoui, Vice President of Government, OEM and Utilities Relations of Volta, also representing EVCA. The communication was oral and included a handout, which is attached to this notice.

Ms. Smart discussed the current posture of the proceeding, noting that there are two options before the Commission. PG&E and a number of its supporters offer a version of the original PG&E proposal that does not comply with the Commission’s instruction regarding scope, size and duration, and that retains problematic program design terms such as utility ownership and control of a large number of EV charging stations, and a process that will limit customer choice, site host options, and driver benefits. Many opposing parties, including ChargePoint, EVCA, the Office of Ratepayer Advocates, The Utility Reform Network, Joint Minority Parties, TechNet, and Vote Solar, support an alternate approach. Ms. Smart explained that, as outlined in the Guiding Principles/Recommendations, ChargePoint, EVCA, and other opposing parties support a compliant and less costly program that would instead offer make ready facilities to all customer segments while focusing PG&E’s resources and attention on market segments such as multi-unit dwellings (“MUDs”) and disadvantaged communities, where additional utility assistance is needed to address obstacles and help achieve the state’s goals for

widespread transportation electrification. While the opposing parties' recommendations are not identical, they share a common approach to key elements of program design such as size, scope and program structure.

Mr. Hawley emphasized that the market for EV charging equipment and services is growing rapidly and innovating constantly. To leverage this innovation for the benefit of the grid and consumers, the Commission should structure programs that focus utility efforts on complementing the work of nonutility players. Mr. Hawley also discussed the Direct Current Fast Charging ("DCFC") market and questions remaining as to how DCFC would be sited in MUDs in PG&E's program. Mr. Cherkaoui noted his concern that the RFP process would discriminate against some market participants. Ms. Quinn questioned the "customer of record" requirement. Ms. Smart discussed the differences between San Diego Gas & Electric Company's approved pilot and PG&E's proposed "settlement" including the lack of customer of choice and incentives for innovation. Ms. Quinn concluded by encouraging the Commission to adopt the alternative approach supported by ratepayer advocates, industry and other active parties. This program design fits the unique characteristics of PG&E's Northern and Central California service territory, supports private investment, and can be efficiently and cost effectively scaled up in the future.

Dated: June 21, 2016

_____/s/_____

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Respectfully submitted,

_____/s/_____

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Guiding Principles/Recommendations

- PG&E's Phase 1 program should comply with the September 4, 2015 Joint Assigned Commissioner and Administrative Law Judges' Scoping Memo and Ruling.
- The program should focus on the underserved customer segments of multi-unit dwellings (MUDs) and disadvantaged communities.
- The total budget should not exceed \$87.4 million (cost of PG&E's "compliant" proposal). Costs should be recovered via a one-way balancing account. PG&E may use any cost savings (budget remaining after deployment of the maximum number of EVSE) for additional deployment consistent with these recommendations and, if relevant, for continued deployment during the transition period.
- The program may include 2,500 Level 2 EV charging stations, and up to 5,000 ports, utilizing dual port charging technology when possible.
- PG&E may install up to 10 DCFC.
- The Phase 1 program will target a minimum of 50% of Level 2 EVSE in MUDs.
- PG&E will establish an open and unconstrained process for site hosts to choose equipment and network services. At all sites, the site host rather than a third party service provider will be PG&E's customer of record.
- The site host may determine the rate structure and amount charged to drivers for EV charging services, subject to the obligation to implement a load management plan reflecting best practices.
- At all sites PG&E may ratebase utility-side infrastructure (make ready) up to but not including the EVSE.
- If (and only if) the Commission deems utility ownership of EVSE is necessary, then it should be limited to the underserved markets of MUDs and low-income communities.
- Site hosts should make a meaningful contribution to the project as a condition of participation.
- The program should be overseen by a Program Advisory Council that includes representatives from local and state government (including Energy Division), industry, labor and other stakeholder participants, ratepayer and environmental advocates, and representatives of disadvantaged communities.
- If the Commission has failed to release a Phase 2 decision before the close of Phase 1, PG&E may file an advice letter to extend Phase 1 by a period of up to one year, with funding limited to the allocated \$87.4 million Phase 1 budget.
- Disadvantaged communities shall be defined as the top quartile of "Disadvantaged Communities" identified by CalEnviroScreen 2.0 on a PG&E service territory basis. For locations within eligible disadvantaged communities, a full waiver of customer contribution to costs shall be provided only to MUDs, not other customer segments.
- PG&E's site selection criteria will coordinate with and leverage PG&E's distribution resources plan ("DRP") and related programs, including PG&E's DRP Integration Capacity Analysis, for integrating distributed energy resources, including EVs, onto PG&E's grid at optimal locations and to maximize grid benefits.